

1 BARRY J. PORTMAN  
Federal Public Defender  
2 GEOFFREY A. HANSEN  
Assistant Federal Public Defender  
3 19th Floor Federal Building – Box 36106  
450 Golden Gate Avenue  
4 San Francisco, CA 94102  
Telephone: (415) 436-7700  
5  
6 Counsel for Defendant TOSCANO-VASQUEZ  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,	)	No. CR-08 - 220 MMC
	)	
12 Plaintiff,	)	<b>DEFENDANT'S SENTENCING</b>
	)	<b>MEMORANDUM</b>
13 vs.	)	
	)	
14 ALEJANDRO TOSCANO-VASQUEZ,	)	
	)	
15 Defendant.	)	
	)	

---

17 All of the parties jointly agree that Mr. Toscano-Vasquez should be sentenced to the low  
18 end of the guideline range, which is 10 months. The Probation Officer has done an excellent job  
19 setting forth not only Mr. Toscano-Vasquez's background and reasons for his actions in this case,  
20 but has explained very well the reasons why the 10 month sentence is appropriate in this case.  
21 See PSR Recommendation at 1-2. For those reasons, the defendant respectfully asks that this  
22 Court sentence him to 10 months in custody, and impose the other conditions recommended by  
23 the Probation Officer.

24 //

1 Dated: July 17, 2008

2 Respectfully submitted,

3 BARRY J. PORTMAN  
4 Federal Public Defender

5 /S/

6 GEOFFREY A. HANSEN  
7 Chief Assistant Federal Public Defender  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26